

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

SUE LACAPRUCIA, individually and on	)	
behalf of all others similarly-situated,	)	
	)	
<i>Plaintiff,</i>	)	Case No. 4:20-cv-00849-BCW
	)	
v.	)	
	)	
SAUNDRA THURMAN-CUSTIS, et al.,	)	
	)	
<i>Defendants.</i>	)	

**PLAN OF ALLOCATION**

Pursuant to the Settlement Agreement in the above-styled action, the following Plan of Allocation is proposed to the Court; unless specifically stated otherwise, any approval of the Settlement includes and incorporates this Plan of Allocation:

1. Of the Settlement Amount, \$50,000 will be allocated to Class Member payments.
2. The identity of Class Members will be ascertained from Court and/or Company Records, as well as any notices and information sent by persons claiming to be covered in the Class. In the event of a discrepancy between records and the claim of any purported Class Member, the Court shall have the authority to resolve the dispute. Defendants agree to produce any documents reasonably necessary for identifying Class Members, and will not oppose the issuance of a subpoena to Crystal Enterprises' former counsel, Lathrop GPM, to obtain such documents.

3. On or before the Effective Date of the Settlement (i.e., the Date of a Final Order of Approval), or such other date determined by the Court, the Court shall issue or approve of a list of persons found to be members of the Class.
4. As set forth in the Settlement Agreement, payments shall be issued after Final Approval to Class Members who have not filed timely requests for exclusion, in an amount equal to the sum of \$50,000 divided by the number of confirmed Class Members. For instance, if there are 25 Class Members, each Class Member will receive a \$2,000 payment.
5. Except as otherwise approved by the Court, such payments will be issued within 30 days of Final Approval.
6. For purposes of this settlement, as pertains to a Class Member who is deceased or otherwise can no longer receive a payment, the payment shall be made to the Class Member's estate or other qualified representative or successor. Class Counsel may request adequate verification of such status, and any disputes or discrepancies shall be resolved by the Court.
7. Class Members or their representatives shall have 180 days to deposit any checks or receive payments.
8. After the period has passed for deposit of any checks, any remaining settlement funds shall be reported to the Court, and retained for a period of 90 days, during which period counsel may engage in further efforts to contact and/or locate the Class Members, but are not obligated to do so.

9. If any missing Class Members or their representatives are located, new checks or payments may be issued.
10. Upon the end of this 90-day follow-up period, if there are any remaining unclaimed finds, Class Counsel shall apply to the Court for an order approving distribution of these funds to a qualified organization by *cy pres* award, or for such other distribution as is appropriate and approved by the Court.
11. This Plan of Allocation may be modified upon application to the Court.